

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

LATINOS FOR TRUMP, BLACKS
FOR TRUMP, JOSHUA MACIAS,
M.S., B. G., J.B., J.J.,

Plaintiffs.

V.

PETE SESSIONS, MITCH
McCONNELL, NANCY PELOSI,
MARK ZUCKERBERG, CHUCK
SCHUMER, ALEXANDRIA
OCASIO-CORTEZ, BRAD
RAFFENSPERGER, ALL
MEMBERS OF THE 117TH U.S.
CONGRESS, et al.,

Defendants.

CIVIL ACTION NO. 6:21-CV-43

JURY TRIAL REQUESTED

TEMPORARY RESTRAINING ORDER

After considering Plaintiff's Motion for Temporary Restraining Order against Defendants, who are the members of the illegitimate 117th Congress, as well as the pleadings and affidavits, the Court FINDS as follows:

1. Plaintiffs will likely suffer the following immediate and irreparable injury, loss, or damage: (1) lose the ability to a government by consent of the governed by virtue of being deprived of the fundamental right to vote in federal elections; and (2) suffer severe financial harm without the ability to collect damages because of the risk that the United States will cease to be safe have for the capital assets of investors

and that the economy is likely to remain unstable if controlled by an illegitimate government.

2. This injury is irreparable because it would be impossible to calculate an appropriate amount of monetary damages to compensate Plaintiffs for the loss of the right to a government by consent of the governed and the financial harm that would ensue with a way to recover monetary damages.

3. This ex parte order is granted without notice to the Defendants because giving notice of a hearing risks that Defendants may destroy evidence and because it would be impracticable to serve the numerous amount of Defendants

For these reasons, the Court ORDERS the following:

- (1) All members of the 117th US Congress, named as Defendants herein are temporarily enjoined from taking any further legislative action, including the passing of bills into law and any other function;
- (2) All actions taken by the members of 117th US Congress since January 3, 2021, including but not limited to:
 - a) All actions taken under Title 3 of the United States Code in counting the Electoral College votes and confirming Joe Biden as President-Elect;
 - b) All actions taken to impeach and convict the 45th President Donald John Trump;

are hereby temporarily enjoined such that they have no lawful effect,

- (3) The inauguration of Joe Biden as President of the United States, set to take place on January 20th, 2021, being caused by the actions of potentially illegitimate Congress, is hereby temporarily enjoined from occurring;
- (4) The Department of Justice, the Federal Bureau of Investigation, and any other federal agency are hereby temporarily enjoined from arresting and/or holding in custody Plaintiff's undersigned lead counsel, Paul M. Davis and co-counsel, Kellye SoRelle, and any plaintiff or potential witness in relation to their exercise of their own exercise of civil rights by their attendance at

the January 6, 2021 protest in Washington, D.C. absent a showing for good cause by clear and convincing evidence that said counsel committed some overt and intentional act of violence that directly resulting in substantial injury to the person of another, as such actions would amount to nothing more than an effort to intimidate and silence Plaintiffs and deprive them of the exercise of civil rights to bring this action under 42 U.S.C. §§ 1983, 1985, 1986 and their rights under the Constitution and which would amount to further civil rights violations by public officials acting under color of the law; and;

- (5) It is further Ordered that President Donald J. Trump shall take all reasonable and necessary action consistent with the Take Care Clause of Article II, Section 1 and all the original intents and purposes of the Constitution of the United States to preserve the lawful and orderly continuity of government while this Order is in effect and this matter is pending.

5. The clerk to issue notice to Defendants, who are the so-called members of the 117th U.S. Congress as named in the Complaint and attached hereto, that the hearing on Plaintiff's request for preliminary injunction is set for _____, 2021, at ___ a.m./p.m.

6. Plaintiff to post bond in the amount of \$_____.

This order will expire on _____, 2021.

SIGNED on _____, 2021, at _____ a.m./p.m.

U.S. DISTRICT JUDGE